

UNITED STATES DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
WASHINGTON, DC

FSIS NOTICE

31-04

6-3-04

VERIFICATION OF IMPLANT USAGE IN NON-RUMINATING CALVES

Do not implement this notice until June 6, 2004.

I. PURPOSE

This notice advises inspection program personnel that the Food and Drug Administration's (FDA) discretionary enforcement guidelines referenced in FSIS Notice 23-04 are no longer in effect as of June 6, 2004. In addition, this notice provides instructions for inspection program personnel to use when they suspect the use of implants in non-ruminating calves.

II. BACKGROUND

Earlier this year for the period between April 5, 2004, to June 5, 2004, FDA determined that meat from non-ruminating calves that had been implanted but from which the drug had been withdrawn for 63 days was acceptable. FDA determined that meat from these veal calves would not pose a risk to human health if there was only short term consumption of the meat. **This discretionary enforcement period has ended.** As a result, after June 5, 2004, each non-ruminating calf presented for slaughter that bears an implant or on which there is evidence of implant use is to be condemned because FSIS cannot determine that the carcass is fit for food.

FDA has determined that implanted calves that have a functioning rumen (see attachment regarding rumination) may be passed for food.

III. ANTEMORTEM VERIFICATION ACTIVITIES

A. During antemortem inspection of calves whose meat is to be labeled as "veal" (i.e., 400 pounds or less with characteristics of immature cattle), inspection program personnel are to visually determine whether the animal has been implanted with any drug, or signs of implant use exist (see attachment regarding implants).

DISTRIBUTION: Inspection
Offices; T/A Inspectors; Plant Mgt;
T/A Plant Mgt; TRA; ABB; TSC;
Import Offices

NOTICE EXPIRES: 7-01-05

OPI: OPPED

B. Signs that implants may have been used are:

1. missing ears
2. ears with incisions indicating recent surgery
3. mutilated ears
4. atrophied testicles or
5. unusually heavy muscle development.

C. If any of the above signs are present, inspection program personnel are to retain the animals and tag them as “U.S. Suspect.” Professional judgment should be used in determining whether the entire lot (i.e., all calves) from the same producer should be tagged “U.S. Suspect” because a significant number of veal calves in the lot exhibit the above signs.

IV. POSTMORTEM VERIFICATION ACTIVITIES

A. Inspection program personnel will palpate the ears of the “U.S. Suspect” carcasses for implants. Inspection program personnel are to consult their supervisor should adjustments in linespeed be necessary to complete the inspection procedure.

NOTE: If necessary, the establishment may remove ears prior to hide removal, place them in a plastic bag, and attach the bag to the carcass. The establishment can also remove the ears when skinning the head and present them for review in manner acceptable to the Inspector-in-Charge.

B. If an implant is present, inspection program personnel will feel a linear, firm swelling right under the skin, when palpating the ear. The implant may feel like “beads on a string.” The individual pellets that make up the implant are approximately 3mm in size and about 2 mm apart.

C. For the “U.S. Suspect” calves showing signs of having implants at ante-mortem inspection, inspection program personnel will retain the carcass for the Public Health Veterinarian (PHV) to examine.

D. The PHV will examine the rumen of the retain carcass to determine whether the rumen was functioning.

1. The PHV may pass the carcass for human food if the animal had a functioning rumen, and the carcass is not subject to condemnation under 9 CFR part 311.

2. The PHV will condemn the carcass if the rumen was not functioning, and the animal

- a. had an implant, or
 - b. had missing ears, ears with incisions indicating recent surgery, or mutilated ears in which the PHV was unable to determine whether an implant was present.

3. If the PHV determines that a calf had an implant and a non-functioning rumen, he or she is to verify, using procedure code 03J, that the establishment takes the appropriate actions under 9 CFR 417.3(a) or 417.3(b). If the establishment fails to do so, the PHV is to issue a noncompliance record.

Philip S. Derfler /s/

Assistant Administrator
Office of Policy, Program, and Employee Development

ATTACHMENT: Veal Implant

Implants

- Veal producers normally place implants below the skin on the dorsal (top) surface of the ear.
- An implant consists of multiple cylindrical shaped pellets approximately $\frac{1}{8}$ th inch in diameter and length. The color is normally white. Size does decrease with time and will affect the ability to palpate the implant.



ATTACHMENT: Photographs of non-ruminating and ruminating calves

Formula Fed Veal (a NON-RUMINATING calf)

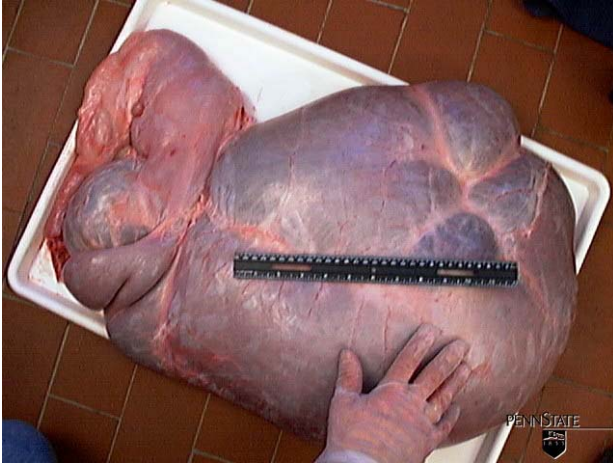
- Formula fed veal calves consume a liquid milk based diet.
- Formula fed veal calves **do not** have a functioning rumen. The rumen is the largest of the four stomach chambers and is connected to the esophagus. In image below, the ruler is lying across the rumen.
- The rumen of a formula fed veal calf is considerably smaller than the rumen of a non-formula fed veal calf. The rumen of a formula fed veal calf has much lighter coloration and lacks the rugae (folds) and papillae (fingerlike projections) development found inside the rumen in a non-formula fed veal calf.
- **When palpated, the rumen of a formula fed veal calf will be soft, limp, thin, and pliable because the rumen is undeveloped. The contents will be fluid. You should not feel solid material within the rumen.**
- Skeletal muscle is pale in color, almost gray in some animals, and very moist.



Rumen and reticulum of a 6 week old formula fed veal calf

Non-formula Fed Veal (a RUMINATING calf)

- Non-formula feed veal calves consume a diet containing hay, grain and/or milk. Non-formula fed veal calves **do** have a functioning rumen.
- A functioning rumen has undergone a physiological change and is capable of digesting hay, and/or grain.
- The rumen of a non-formula feed veal calf is larger with a darker coloration and visible rugae (folds) and papillae (fingerlike projections) on the inside of the rumen.
- In image below the ruler is lying across the rumen.



Rumen and reticulum of a 12 week old non-formula fed veal calf consuming milk, grain, and hay

- **When palpated, the wall of the rumen in a non-formula feed veal calf will be firmer, thicker, and not as pliable because of the greater rumen development. In some calves it is possible to palpate from the outside, the rugae (folds) on the inside surface of the rumen. The contents will be firm and doughy. You may feel grain and solid feed material within the rumen.**
- Skeletal muscle is pink

NOTE: FSIS does not intend for inspection personnel to make incisions into the rumen and reticulum.

Veal Implant Decision Flowchart

